



October 30, 2023

**VIA ECF**

The Honorable Jessica G. L. Clarke  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St., Courtroom 20C  
New York, NY 10007-1312

**Re: Doe v. Black: Case No. 1:23-cv-06418-JGLC**

Dear Judge Clarke:

We represent defendant Leon Black in the above-referenced matter. Pursuant to Your Honor's Individual Rule 5(d)(ii), we respectfully request leave to file the exhibit to my declaration in support of Defendant's Motion for Sanctions Against Wigdor LLP and Jeanne Christensen with redactions. The exhibit is a copy of the Rule 11 letter that I sent to Plaintiff's counsel. The redactions to that exhibit have already been agreed to by the parties and were approved by the court, because the letter was included as part of Plaintiff's prior filings. *See* ECF Doc. No. 57-1, at 5-8; ECF Doc. No. 47 (Order resolving sealing issues).

As with the redactions to the initial Memorandum of Law in Support of the Motion, the proposed redactions are intended to protect the identity of the anonymous Plaintiff and certain medical issues. The parties met and conferred on October 26 and October 30 with respect to these redactions and the proposed redactions have been agreed to by the parties.

We incorporate by reference Defendant's letter motion to seal the initial motion papers (ECF Doc. No. 21) and the arguments contained therein, which apply in equal force here. The redactions remain consistent with the standard set forth in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006), are narrowly tailored to minimize redactions, and are consistent with the presumption in favor of public access to judicial documents.

Although the Plaintiff did not seek permission to redact its filings in opposition to the motion, ECF Doc. Nos. 59-62, we seek the Court's permission to redact the reply brief out of an abundance of caution. The Court's Individual Rules and Practices in Civil Cases state that "all redactions or sealing of public court filings require Court approval" and refer to the need to engage in the process for any "document" that is filed with redactions. *See* Rules 5(c)-(d).

Accordingly, Defendant respectfully requests that the Court permit him to file the exhibit to my declaration in support of Defendant's Motion for Sanctions Against Wigdor LLP and Jeanne

The Honorable Jessica G. L. Clarke  
October 30, 2023

Christensen with redactions. Contemporaneously with filing this letter motion, Defendant has filed an unredacted version of this document, showing the proposed redactions, under seal pursuant to Your Honor's Individual Rule 5(d)(iii).

Very truly yours,

/s/ Susan Estrich

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